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8 UNITED STATES BANKRUPTCY COURT  
9 EASTERN DISTRICT OF WASHINGTON

10 In re:

11 SHUMATE SPOKANE, LLC,

12 Debtor.

CASE NO. 09-05081(FLK)

**NOTICE OF MOTION OF CREDITOR  
PORSCHE FINANCIAL SERVICES,  
INC. FOR ENTRY OF AN ORDER TO  
COMPEL THE DEBTOR TO ASSUME  
OR REJECT THE LEASE OR  
ALTERNATIVELY GRANTING  
ADEQUATE PROTECTION**

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14 PLEASE TAKE NOTICE that on December 31, 2009, Porsche Financial Services,  
15 Inc., a creditor herein, filed its Motion for Entry of an Order Compelling the Debtor to  
16 Assume or Reject the Lease or Alternatively Granting Adequate Protection, by and  
17 through Robert Crowley, its counsel of record in this matter.

18 PLEASE TAKE FURTHER NOTICE that this Motion will become final as to you  
19 unless you file a written objection with the United States Bankruptcy Court for the  
20 Eastern District of Washington, POB, 2164, Spokane, Washington 99210 and serve a  
21 copy upon the undersigned attorney at:

22 Robert M. Crowley  
23 DORSEY & WHITNEY LLP  
24 Columbia Center  
25 701 Fifth Avenue, Suite 6100  
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on or before twenty-four (24) days after the date of mailing this Notice. If you file a written objection, you will receive notice of the date and time of hearing on your objection. If you fail to timely file an objection or if you file an objection but do not state the basis or reasons for your objections, the Court may grant such further relief, including granting the Motion, as the Court sees fit.

PLEASE TAKE FURTHER NOTICE that the Motion seeks relief in the form of an order compelling the Debtor to assume or reject the Lease on or before a date certain, and in the event of rejection, requiring the Debtor to surrender the 2009 Porsche Cayenne GTS (the "Vehicle") that is the subject of the Lease at a specified location within five (5) days such rejection. The Motion seeks alternative relief in the form of an order requiring the Debtor to provide adequate protection to Porsche Financial in the form of proof of insurance and payments due under the Lease.

As of December 30, 2009, the Debtor owes under the Lease approximately \$73,625.96 in overdue payments, accelerated payments and fees and costs under the terms of the Lease, plus Porsche Financial's reasonable attorneys' fees and other fees pursuant to the express terms of the Lease.

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1 Pursuant to LR 4001-1, the Kelly Blue-Book trade-in value of the Vehicle is  
2 \$68,275.

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4 Dated: December 31, 2009

/s/ Robert M. Crowley

5 Robert Crowley (WSBA #37953)

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9 Seattle, WA 98104

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12 Attorneys for Porsche Financial Services, Inc.

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Date of Mailing: December 31, 2009